



THE LAW OFFICES OF

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June 10, 2022

Judge Nicholas G. Garaufis
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201
VIA ECF

RE: United States v. Michael Mancuso

CR No. 05-CR-60

Violation of Supervised Release Hearing

1) Adjournment Request (Second)

Currently Scheduled Date: 6/15/22 at 11:00 a.m.

Request For Clarification On This Aspect of the 5/29/22 Request

Your Honor:

The defense requested a second adjournment of the Violation of Supervised Release on May 29, 2022. The hearing is currently scheduled for 6/15/22 at 11:00 a.m. The Government has no objection; the Government again on June 7, 2022 reaffirmed it has no objection to the adjournment. There are still hours of recordings to get through, and outstanding defense requests for medical records. Thus, there will be additional reciprocal discovery that counsel hopes will obviate the need for the hearing. I thank the Court for the order to Probation to provide the Monthly Supervision Reports, those were provided to Counsel and to the Government on June 7, 2022; these reports in themselves require some further review.

As stated in the May 29, 2022, request for the second adjournment: "The first request for an adjournment was necessitated due to a delay in receiving the protective order, which in turn delayed the receipt of discovery. There remain some issues with some of the discovery upon which I am conferring with the Government; and finally, some of the anticipated reciprocal discovery is still taking yet more time to gather. Some of the reciprocal discovery requires contact through other counsel and HIPAA releases, thus the defense will need some time. Additionally, there seems to be some cross referencing the depth of which the defense still does not have clarity on."

Preliminarily, I request a date in mid to late July or early August, as I will be traveling from June 22-July 2, 2022 (with the discovery there is much to review), as I introduced my friends' children and they are getting married. I apologize but my goal is to be thorough for all.



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In accord with this Court's individual rules, please note that Mr. Mancuso is fully vaccinated, he had both his first and second booster.

I look forward to the direction of the Court, with apologies for the necessity of this request.

Most respectfully,

Stacey Richman

cc:

Via Email and ECF

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